

March 7, 2014

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, SW Washington, District of Columbia 20554

SUBJECT: LETTER OF INTEREST – TECHNOLOGY TRANSITION EXPERIMENT

WC DOCKET NO. 10-90

Dear Ms. Dortch:

Sierra Telephone Company, Inc. ("Sierra Telephone") wishes to express interest in potential funding pursuant to WC Docket No. 10-90 for the purpose of providing a trial experiment for a broadband IP network to a currently unserved rural population as defined in this Letter of Interest. Sierra's commitment to pursue this project depends on the availability of further information from the Federal Communications Commission ("FCC") regarding the conditions associated with broadband "experiments" and upon Sierra Telephone's ability to obtain necessary certifications from the California Public Utilities Commission ("CPUC") to qualify for Connect America Fund ("CAF") outside of Sierra Telephone's ILEC service territory. However, Sierra Telephone submits this Letter of Interest to inform the FCC that Sierra Telephone has identified a potential "experiment" project for which CAF funding would be appropriate, and as long as the regulatory contingencies in connection with the project are satisfactory to Sierra Telephone and can be resolved within a reasonable time, Sierra Telephone would like to pursue this project.

Background

Sierra Telephone serves approximately 19,000 access lines over a 775 square mile area in eastern Madera and Mariposa counties. Over 400 miles of fiber optic network facilitates the deployment of high-speed broadband services and provides reliable, secure service of the highest quality. The mission of Sierra Telephone is to be the provider of choice for integrated telecommunications solutions, delivering exceptional products and services and excellent customer service.

Geographic and Demographic Territory

Sierra Telephone is proposing to serve the communities of Greely Hill, Coulterville, and East Don Pedro Lake in Mariposa County, California, unserved Tract ID 6043000302 as illustrated in Exhibit A. The topography of the serving area ranges from an elevation of 800 feet of rural ranch land to an elevation of 3,000 feet of rugged, remote and granite filled mountains.

Population density is as low as 40 people per square mile. Twenty-five percent of the population is over the age of 65; their need for broadband access is critical to address issues such as social isolation, digital literacy, access to health resources, and more.

List of Anchor Institutions

Mariposa County Government – Greeley Hill, Sheriff's Satellite Office – Don Pedro, Public Works – Coulterville, Fire Department – Coulterville.

Mariposa County Schools: Coulterville-Greely Hill Elementary, Coulterville High School, and Lake Don Pedro Elementary,

Proposed Technology

We are proposing the construction of three separate fiber optic cable segments totaling approximately 75 miles; each route will provide gigabit transport to aforementioned communities.

Government and Educational Support of the Project

Mariposa County Office of Education and Mariposa County Government offices were both contacted to explore their interest in participating in this trial experiment and they both responded enthusiastically. They expressed their frustration with their current carrier's unwillingness and or inability to provide them better than dial up internet access. Rick Peresan from Mariposa County said AT&T notified him that they would no longer support his frame relay service in Greely Hill and it was going to be disconnected.

John Corippo the Assistant Superintendent of Curriculum & Instruction at Mariposa County Schools said, "The state and federal accountability testing is going to be all digital within one to two years. Our schools deserve a fair chance for our kids to be on an even playing field with the whole world. Mariposa schools are ready to be aggressive with technology, but we need to have access to gigabit broadband connections."

Rick Peresan the Technical Services Director for Mariposa County said that many areas of the county are separated by geography and it is difficult and costly to extend health, safety, and public services needed by their constituents. The availability to extend affordable broadband and network connections would enhance county government's ability to deliver services and would reduce cost and improve the overall economic opportunities of their outlying areas.

Existing Providers

AT&T is the incumbent and sole provider of services in the project area and currently does not provide anything better than dial up services. However, the area is listed as "unserved" according to the FCC's data supplied in connection with potential broadband trial projects.

Project Timeline

Sierra Telephone has its own construction assets and already owns a fiber optic backbone adjacent to the proposed build area. Engineering the project will take two months, right-a-way is

expected to take four months, and construction of all three segments at thirty months. We anticipate, barring any delays caused by the terrain or other unforeseen hindrances, completing this project in three years.

Scalability

Sierra Telephone expects to complete the project in three segments within Mariposa County. The first segment would be a buried fiber optic cable from Catheys Valley to Don Pedro, segment two would be from Lake Don Pedro to Coulterville, and segment three would be from Coulterville to Greeley Hill.

Estimated Cost

Switching Equipment \$500,000 Fiber Optic Cable, Hardware and Construction \$4,000,000

Total Estimated Investment \$4,500,000

Thank you for your consideration.

Sincerely,

Cridy a. Huber

Cindy A. Huber Vice President Operations

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Exhibit A

